

**STEVEN R. DONZIGER, ESQ.**

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August 20, 2018

**VIA ECF**

Honorable Lewis A. Kaplan  
United States District Judge  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, New York 10007

RE: *Chevron v. Donziger*, Case No. 11 Civ. 691 (LAK)

Dear Judge Kaplan:

I write in regard to the Court's recent order dated August 15, 2018 (Dkt. 2072) that I execute documents transferring certain property interests to Chevron Corporation. I am currently out of the country through Labor Day, with no way to access a U.S.-qualified notary, and I am not sure that a foreign notary would meet the Court's requirements. Additionally, I am seeking adequate counsel on the issue of transferring my contingency interest. My clients have forbidden me to make such a transfer and made it clear that, despite the Court's order, a transfer would be considered an act of cooperation with and enrichment of Chevron in violation of my fiduciary duties toward them, that could result in my termination. I respectfully request a modest extension of time through the end of the week after Labor Day (*i.e.*, to September 7) to return from travel and properly address the ethical issues raised by the ordered transfer.

Sincerely,

/ s /

Steven R. Donziger